



Modern Slavery and Human Trafficking Statement 2022

The following statement sets out the actions taken by Glanbia plc (“Glanbia” or the “Group”) to address modern slavery and human trafficking risks across our business and supply chain for the financial year ended 31 December 2022.

Our Statement on Modern Slavery and Associated Policies

Glanbia is committed to upholding international human rights and to acting with integrity in all of its dealings, relationships, and supply chains. We have a zero-tolerance approach to slavery and human trafficking. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities. In this statement, Glanbia reports on its actions to assess and address modern slavery risks associated with its operations. This includes its employment practices and the steps taken in assessing and addressing modern slavery risks within our supply chain.

Our Business

Glanbia is a better nutrition company. Our purpose is to deliver better nutrition for every step of life’s journey.

We are committed to finding better, healthier and more sustainable nutritional products that fit the lifestyles and needs of people around the world.

This includes world-leading sports nutrition and lifestyle brands and large-scale, expert capabilities in proprietary technologies across a range of nutritional ingredients.

Over the past decade our portfolio has evolved from base ingredients to higher-value ingredient solutions and branded products.

Glanbia plc is a public limited company incorporated and headquartered in the Republic of Ireland. Total Group employees, including Joint Ventures, amounts to over 5,500 people, which includes 92 nationalities based across 32 countries. Our major production facilities are located in the US, the UK, Germany and China. We have two global growth platforms in Glanbia Performance Nutrition and Glanbia Nutritionals. We also have key strategic long term partnerships in our Joint Ventures.

Organisational Structure

Glanbia Performance Nutrition (GPN) is the number one global sports nutrition portfolio¹ with a growing position in US lifestyle nutrition. GPN’s mission is to inspire people everywhere to achieve their performance and healthy lifestyle goals, and we achieve this through education, advocacy, quality and authenticity. Our portfolio comprises nine brands – Optimum Nutrition (ON), BSN, Isopure, Nutramino, SlimFast, think! Amazing Grass,

Body & Fit and LevUp. Our brands are sold in over 100 countries online and in mass retailers, speciality stores and pharmacies.

Glanbia Nutritionals (GN) is comprised of GN Nutritional Solutions (NS) and GN US Cheese. GN NS is a global provider of innovative nutritional and functional solutions. Through its extensive portfolio of dairy and non-dairy ingredients and capabilities, GN NS provides a wide range of science-led solutions to customers across the globe.

Our combined US cheese business and US JV cheese and dairy operations make us the number one provider of American-style cheddar cheese. GN US Cheese supplies natural cheese to brand owners and other leading food service organisations globally.

Glanbia’s Joint Venture activities are focused at MWC-Southwest Holdings², a US business with strong alignment to our Glanbia Nutritionals platform. For 2022, Glanbia’s joint ventures (continuing operations) included MWC-Southwest Holdings, Glanbia Cheese EU and Glanbia Cheese UK (collectively “Glanbia Cheese”)³. We announced within Glanbia’s FY2022 annual report, our intention to sell our shareholding in Glanbia Cheese Joint Ventures to Leprino Foods Company, our long-standing partner in these businesses. This transaction was completed on 28 April 2023.

More information on our business can be found in our 2022 Annual Report and Financial Statements which can be accessed at [glanbia.com](https://www.glanbia.com).

1. Euromonitor

2. MWC-Southwest Holdings – are US producers of American-style cheddar cheese and whey ingredients with plant locations in New Mexico and Michigan.

3. Glanbia Cheese EU and Glanbia Cheese UK – a large-scale manufacturer and marketer of mozzarella cheese, manufacturing in the UK and Ireland

Key Achievements in 2022 and to date in 2023

In 2022, we made significant progress in further developing our responsible procurement programme, updating our Global Procurement Policy. This includes embedding assessments by EcoVadis, an independent sustainability ratings firm, to help support and develop our responsible procurement programme and due diligence procedures relating to our suppliers.

During 2022, we updated our Group Supplier Code of Conduct, Group Code of Conduct and Group Anti-bribery and Corruption policy. An accompanying Code of Conduct training programme was developed which was formally launched in January 2023. Other policies related to this statement updated and recommunicated to our employees in 2023 include the Group Human Rights Policy and Group Speak Up Policy.

We have made our Group Speak Up Policy publicly available and attached details of our speak-up line 'Safe Call' contact details to this and all related policies for ease of access and to provide further transparency around this process.

These policies are available on our website [glanbia.com](https://www.glanbia.com).

Goals and Commitments for 2023

Expand our visibility of supplier ESG performance through participation in the EcoVadis programme and work with them to improve, where required. We aim to have all 'high' and 'medium-high' risk suppliers, with whom we have an ongoing trading relationship, on the EcoVadis platform in 2023.

Our Global Procurement Policy is updated regularly and is currently undergoing a review to take into account various changes relating to responsible procurement and ethical trading requirements, including our Group Supplier Code of Conduct. Such changes will be rolled out in 2023.

Deliver our learning programmes which includes modern slavery and human rights subject matter to more colleagues across our business through the systematic roll out of the Code of Conduct training programme across our employee base.



Our Supply Chain

The Glanbia Procurement team's mission statement is "Creating value for all stakeholders through responsible procurement".

Glanbia spends in excess of €2bn annually sourcing goods and services from over 6,000 suppliers in 55 countries. Glanbia aims to responsibly source all products and services, while also securing the livelihoods of the communities that underpin it.

Our supply chain includes direct suppliers who are involved in the processing and distribution of raw materials. The most significant of these being milk supply within North America. Indirect suppliers provide us with a range of goods and services that are essential to the effective operation of our business. To ensure our procurement spend contributes to improving social, economic and environmental impacts on stakeholders, we continue to risk assess and seek a further understanding of spend. We have also established minimum ethical and environmental standards, to which we expect our suppliers to adhere. These standards are outlined in the Group's Supplier Code of Conduct.

Glanbia's Procurement teams are dedicated to partnering with key stakeholders to support the delivery of Group and business unit ESG strategies and commitments. This involves:

- Driving greater awareness across our procurement teams of responsible sourcing practices;
- Partnering with suppliers who can make a positive contribution towards Glanbia's ESG commitment;
- Applying responsible sourcing criteria to our supplier selection decisions and incorporating responsible sourcing principles into our Global Procurement Policy;
- Requiring all suppliers to agree to comply with laws and regulations of the countries in which they operate;
- Requiring all suppliers to agree to comply with all human rights, labour, food safety, environment and health and safety regulations;
- Requiring suppliers, as requested, to engage with Glanbia's selected partner EcoVadis for assessment (or equivalent assessment as deemed appropriate) in line with Glanbia's Responsible Procurement Programme; and
- Requiring suppliers to comply with necessary corrective actions that arise as a result of the above assessment.

Our Approach

Glanbia purchases only from approved suppliers. Buying from the right suppliers is critical to ensuring Glanbia receives high quality goods and services at the right price and time while mitigating risk to the organisation. At Glanbia, we promote the highest standards of ethical business conduct and sustainable business practices wherever we operate. We encourage our suppliers to have the same level of commitment to these standards.

Our Group-wide Responsible Procurement Programme sets out our supplier selection criteria and integrates ESG into our procurement processes, procedures and systems. We focus on ensuring and re-enforcing compliance with all applicable laws on anti-slavery and human trafficking, requiring our suppliers to confirm acceptance and conformance with the relevant Glanbia policies.

In 2022, we commenced a risk assessment on our supply base, with EcoVadis, assessing ESG and procurement risks. The results of this risk assessment enable us to prioritise the suppliers that require a more in-depth assessment using the EcoVadis platform (referred to as scorecards).

The objective of the EcoVadis methodology is to measure the quality of a company's ESG management system through its policies, actions and results focusing on environment, labour and human rights, ethics and sustainable procurement. A company's size, industry and geographical locations are also considered. All assessments are evidence based and validated by EcoVadis experts and scored accordingly. The platform helps us benchmark against our industry, reduce risk, drive performance and improve environmental and social outcomes by collaborating with our suppliers on ESG performance.

More than 40% of Glanbia's total spend (both direct and indirect) underwent in-depth assessments (scorecards) by the end of 2022. We have set the target of utilising scorecards for all 'high' and 'medium-high' risk suppliers with whom Glanbia has an ongoing trading relationship in 2023. This equates to an additional €50m spend to be onboarded to the EcoVadis platform which will bring the overall percentage spend coverage to 55% by end of 2023. The growth of coverage in 2023 will be more conservative than 2022 because our largest spend has already been covered in the first cohort of assessments. The detailed scorecards assess our supply chain and identify key areas to be improved, for further information, refer to page 36 of [Glanbia's GRI Report 2022](#). We will work with our suppliers to develop their sustainability profile in line with Glanbia and customer requirements.

We also engage with our suppliers through ongoing dialogue via our commercial supply chain teams and through dedicated farm relations teams. We value a strong working partnership with our dairy suppliers. For example, since 2012 we have worked with our Idaho milk suppliers (our key US milk supply base for our wholly owned business) on a journey of continuous improvement. The approach has seen GN require suppliers to be in full standing with the National Milk Producers Federation (NMPF) Farmers Assuring Responsible Management (FARM) programme.

FARM provides the evidence that US dairy farmers are operating to the highest standards, including a Workforce Development (WFD) programme.

The WFD programme focuses on the people who work on-farm, and aims to provide dairy owners and managers with tools to enhance safe and thriving work environments. This includes a suite of education materials such as best in class HR and safety manuals, HR templates and legal fact sheets. 100% of our Idaho supply base have implemented the FARM modules.

We are aware that even with due diligence processes in place, incidents of modern slavery can occur and so we extend our Speak Up line to those within our supply chain.



Our People

One of Glanbia's goals is to develop the talent, culture, and values of Glanbia, within an inclusive framework that protects and develops our people, respects the wider community and upholds international human rights.

Human Rights and Employment Standards

Our Human Rights Policy is grounded in the following human rights standards:

- United Nations Universal Declaration of Human Rights;
- United Nations Guiding Principles on Business and Human Rights; and
- International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

Glanbia is committed to upholding international human rights and we have a zero-tolerance approach to slavery and human trafficking and other human rights infringements. We are deeply committed to respecting and safeguarding the people who work for us and those who are affected by our activities.

We are committed to fully investigating and remedying any adverse human rights impact identified and take any such allegations very seriously. Glanbia applies the following principles in order to promote a respectful and rewarding workplace, partnering with our supply chain, and supporting the communities where we operate.

Employees and other workers are:

- provided with a safe working environment;
- paid fairly and on-time for the work they do;
- provided with working hours that comply with national laws and industry standards;
- (have) the right to freedom of association and collective bargaining;
- not subjected to any form of involuntary servitude or duress, such as having to repay large loans or having their passport retained;
- not discriminated against because of their gender, civil status, family status, sexual orientation, religion, age, disability, race membership of a minority community/group or any other status protected by applicable law;
- not subjected to physical, verbal, sexual, racial, psychological, or any other forms of abuse, bullying or harassment;
- not under the legal minimum age of employment, with a zero-tolerance for the exploitation of children; and
- provided with fair procedure and absence of discrimination in any grievance, disciplinary or other investigation or resolution process.

Our Group Code of Conduct and Group Supplier Code of Conduct also clearly outline our standards and commitments in relation to human rights including explicitly prohibiting the use of child and forced labour within our operations or those of anyone connected with the Group.



Governance

Board oversight, clear policies, robust systems, active stakeholder engagement and disclosure are all fundamental drivers of a strong governance programme.

To ensure clarity on the ethical standards we require from every employee and supplier, there are a number of key policies which set out the requirements within the Group and also with those who we seek to do business with, these policies are reviewed, updated and communicated on a regular basis.

- **Group Code of Conduct** - sets out what we stand for as a business and how we demonstrate the highest standards of integrity and ethical behaviour. It is guided by our purpose, vision and values. It provides clarity on how we are expected to behave to build the trust and respect of everyone who interacts with us. Our Code is underpinned by several global policies, standards and guidelines covering specific areas of our work.
- **Group Speak Up Policy** - provides guidance for individuals who wish to raise certain concerns or issues about Glanbia in confidence and sets out clearly that Glanbia values those who raise concerns in good faith and will not tolerate retaliation.
- **Group Human Rights Policy** - is aligned with the UN declaration on human rights and affirms our commitment to upholding internationally recognised human rights.
- **Group Supplier Code of Conduct** - outlines the minimum standards we expect from providers of goods and services to Glanbia. We keep this Code under ongoing review, to robustly protect the rights of workers within our supply chain. It is explicit in directing that forced or involuntary labour shall not be permitted.

While our Human Resource and Procurement functions take a lead role on upholding human rights, the entire organisation is accountable and is expected to work together to achieve our goals and commitments. We continue to build the capacity of our people on modern slavery and human rights generally. This includes working collaboratively with others, enhancing our training and communication programmes and reporting functionality.

Speak Up, Whistleblowing Procedures

We encourage our employees, other workers and external parties to 'Speak Up' and report any situation where they have a reasonable belief that there has been a breach or potential breach of our policies, our Code of Conduct or the law which could amount to wrongdoing, illegal practices and/or unethical behaviour. To support our policy commitments, we have grievance mechanisms in place as outlined within our Speak Up Policy, including a confidential speak up line 'Safe Call'. This facility is available to both employees and third parties to raise a concern in confidence, 24-hours a day by phone, or online. Our Speak Up Policy and related processes were reviewed in 2022 to assess its compatibility with the EU Whistleblowing Directive, with relevant updates made.

For employees, the Safe Call facility complements, rather than replaces reporting issues to line managers, senior local management, senior Group management or the Group Secretary. Grievances are investigated and, where necessary, anonymised to protect those raising the issue.

For suppliers and external parties we advertise our Safe Call procedures and contact details through the following externally available policies: Speak Up Policy, Code of Conduct and Human Rights Policy, available at glanbia.com. We also have contact details posted on noticeboards and information screens within our facilities.

All concerns raised in this manner will be assessed, fully investigated and appropriate action taken. All whistleblowing incidents are reviewed by the Group Secretary and formally investigated as appropriate depending on the nature of the concern raised. In 2022, there were no reports of trafficking or modern slavery received through this service.

Assessment and Due Diligence

To ensure compliance with our policies, we take the following steps to assess and monitor potential risks in our supply chain:

- Mitigate against the risk of slavery and human trafficking by following the Global Procurement Policy requirements and review of EcoVadis supplier analysis.
- Independent audits of our operating sites through the Glanbia Risk Management Process.
- Facilitate, without fear of recrimination, our people in reporting any concerns in relation to slavery and human trafficking within the Group operations or supply chain and ensure appropriate oversight and actions are implemented for each incident raised.
- Deployment of appropriate training and communication to our employees to support them in executing their role to ensure Glanbia's commitment to combat modern slavery and human trafficking is upheld.

Global Procurement Procedures

Following application of our Responsible Procurement Programme, where a supplier is identified as not having suitable controls in place to prevent slavery and human trafficking, we will assess whether we can work with them to address the improvement opportunities. If the supplier in question is unwilling to engage with us, or suitable controls cannot be put in place, we will discontinue our relationship with the supplier in question. It may also involve notifying relevant authorities of the issues involved.

Glanbia Risk Management System (GRMS)

GRMS is an auditable framework for the identification and management of operational risks across the Group. Assessment and ranking levels are based on international risk management standards. Assessments are conducted by an independent third party to help drive a culture of continuous improvement across our sites.

Review of Speak Up Procedures

The Board maintains a process for communicating critical concerns through the Audit Committee, which reviews the effectiveness of our systems of internal control and risk management, including oversight of all whistleblowing activities. Our culture is measured through several mechanisms including policy and compliance processes, internal audit activities and both formal and informal channels for employees to raise concerns as referenced in the preceding paragraphs. The Board is apprised of any material whistleblowing incidents and Glanbia's Board Chairman, as Workforce Engagement Director, reviews them on an ongoing basis throughout the year.

All incidents reported via our Safe Call facility are reviewed by the Group Secretary and formally investigated by the relevant functional heads depending on the nature of the concern raised. Group Internal Audit reviewed all incidents raised during 2022. This review was summarised by issue theme, and presented to the Audit Committee, which supported their assessment of the adequacy of the Group's whistleblowing arrangements.

Communication and Training

Glanbia continues to develop its commitment to combat slavery and human trafficking. In 2022, we conducted dedicated training for our procurement colleagues around human rights associated with our supply chain, and rolled out the customised reporting tool EcoVadis to support them.

At the start of 2022 we updated a number of key Group policies including the Code of Conduct, Anti-bribery and Corruption Policy, Procurement Policy and Supplier Code of Conduct, these policies hold a prominent position and are easily accessible on our intranet site 'Our Glanbia'.

In 2023, we updated and recommunicated our Speak Up Policy and related Safecall facility to our employees, updating our dedicated intranet page and providing communication materials for posting across our sites.

We also understand that raising awareness is key in addressing the risk of modern slavery and human trafficking. We recognise the need to continue building capacity among our employees to identify risks of modern slavery and the actions required to respond effectively. With this in mind we are rolling out employee training on the updated Group Code of Conduct which will include our commitment on upholding human rights.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 in the UK and pursuant to Section 14 of the Australian Modern Slavery Act 2018 (Cth) in Australia. It constitutes the slavery and human trafficking statement of Glanbia plc's UK and Australian legal entities in respect of the financial year ended 31 December 2022. Glanbia is aware that similar legislation (requiring companies to comply with human trafficking and anti-slavery laws) is in place in various other jurisdictions where we operate. This statement is therefore to be read as applying to Glanbia entities across all of the locations we trade in.

This statement was approved by the Board of Glanbia plc on 22 June 2023.



Siobhán Talbot,
Group Managing Director

Glanbia Holdings Limited

Glanbia Investments (UK) Limited

Glanbia Milk Limited

Glanbia Performance Nutrition (UK) Limited

Glanbia Performance Nutrition (UK Sales Division) Limited

Glanbia (UK) Limited

Waterford Foods International Limited

Glanbia Performance Nutrition Pty Ltd

